

1 PHILLIP A. TALBERT
2 United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

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8 Attorneys for the United States

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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,

15 v.
16 Plaintiff,

17 APPROXIMATELY \$11,000.00 IN
18 U.S. CURRENCY,

19 Defendant.

20 2:22-MC-00156-WBS-KJN

21 STIPULATION AND ORDER EXTENDING TIME
22 FOR FILING A COMPLAINT FOR FORFEITURE
23 AND/OR TO OBTAIN AN INDICTMENT
24 ALLEGING FORFEITURE

25 It is hereby stipulated by and between the United States of America and potential claimant Alana
26 Wynne (“claimant”), by and through their respective counsel, as follows:

27 1. On or about February 16, 2022, claimant filed a claim in the administrative forfeiture
28 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
\$11,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 30, 2021.

29 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
30 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
31 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
32 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

33 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
34 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline is May 17, 2022.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
5 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to July 15, 2022.

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12 Dated: 05/16/22

PHILLIP A. TALBERT
United States Attorney

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By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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15 Dated: 05/16/22

16 /s/ Bruce Rivers
17 BRUCE RIVERS
18 Attorney for potential claimant
19 Alana Wynne
20 RIVERS LAW FIRMS, P.A.
21 701 Fourth Avenue South, Suite 300
Minneapolis, MN 55415
612-339-3939
kwilson@riverslawyers.com

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(Signature authorized by email)

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24 **IT IS SO ORDERED.**

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Dated: May 17, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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